

DEFENDANT'S MOTION FOR A PROTECTIVE ORDER

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Pursuant to Federal Rules of Civil Procedure 26, 29, and 30, Defendant Andrew Anglin respectfully moves the Court for a protective order excusing Mr. Anglin from being required to appear for an in-person deposition within the United States.

As set forth in great detail in the accompanying Brief, Mr. Anglin does not reside in the United States and has no intention of returning to the country out of fear for his personal safety. For these reasons, the Court should not require him to travel to the U.S. for a deposition, and instead should allow him to be deposed outside the U.S. either in-person or through remote means, such as by telephone or video conference.

From February 19 to 20, 2019, counsel for the parties met and conferred via detailed written correspondence. Counsel for Plaintiff indicated that Plaintiff does not consent to the relief requested in this Motion.

WHEREFORE Mr. Anglin requests the Court to enter a protective order excusing Mr. Anglin from being required to appear for an in-person deposition within the United States.

Dated: February 27, 2019.

Respectfully submitted,

/s/ Marc J. Randazza

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CERTIFICATE PURSUANT TO LR 26.3(C)(2)(B)

Pursuant to Local Rule 26.3(c)(2)(B), I hereby certify that the parties complied with subsection (c)(1) prior to filing this motion through comprehensive correspondence.

/s/ Marc J. Randazza

Marc J. Randazza

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 27, 2019, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I further certify that a true and correct copy of the foregoing document is being served via transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ Marc J. Randazza

Marc J. Randazza